

555 Eleventh Street, NW
Mail Station 07
Washington, DC 20004-1304
Sender's Direct Line: 202.365.0325
KB@KarenBrinkmann.com

REDACTED - FOR PUBLIC INSPECTION

November 28, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Applications of GCI Communication Corp., ACS Wireless License Sub, Inc.,

ACS of Anchorage License Sub, Inc., and Unicom, Inc. for Consent to the

Assignment of Licenses to Alaska Wireless Network, LLC

WT Docket No. 12-187

Dear Ms. Dortch:

On behalf of ACS Wireless License Sub, Inc. and ACS of Anchorage License Sub, Inc. (collectively "ACS"), ACS responds to information request number 14 from the Wireless Telecommunications Bureau's October 11, 2012 request for information and clarification in the above-referenced proceeding (the "October 11 Letter"). ¹

Information request number 14 states:

14. The Applicants, at page 39, note 74 of the Public Interest Statement, claim that limited network interconnectivity will occur in the near term under a standalone commercial agreement. Explain how and when this interconnectivity will occur; why there is no need for a change in facilities ownership or control to achieve this interconnection; and the effects on competition in the relevant market.

Letter from Ruth Milkman, Chief, Wireless Telecommunications Bureau, to Lisa Phillips, ACS Wireless, WT Docket No. 12-187 (Oct. 11, 2012).

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary Federal Communications Commission November 28, 2012 Page 2 of 4

ACS Response:

As explained in the Public Interest Statement, ACS Wireless provides commercial mobile radio services ("CMRS") to approximately 118,000 subscribers in various locations in Alaska over its own Code Division Multiple Access ("CDMA") and third-generation ("3G") Evolution-Data Optimized ("EV-DO") network facilities. ACS Wireless has begun the process of deploying fourth-generation ("4G") Long-Term Evolution ("LTE") network facilities for the provision of high-speed mobile wireless data services. ACS Wireless has access to spectrum through the Applicants ACS Wireless License Sub, Inc. and ACS of Anchorage License Sub, Inc., including spectrum in the cellular (800 MHz) band, the PCS (1.9 GHz) band, and the AWS (1710-1755 MHz/2110-2155 MHz) band. ACS Wireless currently offers mobile voice service over its CDMA network and mobile broadband data service over its LTE network. Customers of ACS Wireless have a very limited choice of CMRS devices suitable for both voice and broadband data service.

As described in the Public Interest Statement, GCI provides CMRS to approximately 140,000 wireless subscribers throughout most of Alaska over its own 2G, 3G, and 4G Evolved High-Speed Packet Access ("HSPA+") services, as middle-mile capabilities permit. As described in the Public Interest Statement, GCI has spectrum licenses in the cellular (800 MHz) band and PCS (1.9 GHz) bands. GCI currently serves some voice and data customers over its CDMA network, and others over its GSM/EDGE/HSPA/HSPA+ network facilities.

[REDACTED]

REDACTED - FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary Federal Communications Commission November 28, 2012 Page 3 of 4

[REDACTED]

In addition, this arrangement will permit customers with CMRS devices capable of operating on both LTE and HSPA+ networks to access the best data technology available in the area, wherever they are, using a single, more advanced device.

[REDACTED]

No regulatory approval was needed for arms' length commercial arrangements involving no assignment of license nor transfer of control of any FCC licensee, and no sale or assignment of assets – each party retains full ownership of its existing facilities. Rather, these arrangements are similar to a roaming agreement, a routine commercial transaction in the CMRS industry not requiring prior regulatory approval.

The information provided in this response to discovery request number 14 is Highly Confidential to ACS and therefore is being provided under seal pursuant to the Commission's Second Protective Order in this docket. The highly confidential information is marked Highly Confidential for the filing of the confidential version of this letter and the highly confidential information is redacted for the filing of the public version of this letter, consistent with the requirements of the Second Protective Order.

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary Federal Communications Commission November 28, 2012 Page 4 of 4

Please contact me should any questions arise concerning this filing.

Respectfully submitted,

/s/
Karen Brinkmann
KAREN BRINKMANN PLLC
555 Eleventh Street, NW
Mail Station 07
Washington, D.C. 20004-1304
(202) 365-0325
KB@KarenBrinkmann.com
Counsel for ACS

cc: Kathy Harris, Wireless Telecommunications Bureau